

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:    MARY STRAVINSKI  
          AKA: MARY CRAWLEY

CHAPTER 13

Debtor(s)  
JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE  
Movant  
vs.  
MARY STRAVINSKI  
AKA: MARY CRAWLEY

CASE NO: 5-22-01642-MJC

Respondent(s)

**TRUSTEE'S MOTION TO DISMISS CASE**

AND NOW, on December 22, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, through his attorney Agatha R. McHale, Esquire, and respectfully represents the following:

1. A Plan was filed on September 1, 2022.
2. A hearing was held and an Order was entered on November 29, 2022 directing that an amended plan be filed within fourteen (14) days.
3. As of the date of this Motion, an amended plan has not been filed.
4. The delay in filing a confirmable plan in this case is prejudicial to creditors.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case upon the basis that Debtors have failed to propose a confirmable plan.

Respectfully submitted,

/s/ Agatha R. McHale, Esq.  
Id: 47613  
Attorney for Movant  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
Suite A, 8125 Adams Drive  
Hummelstown, PA 17036  
Phone: 717-566-6097  
email: amchale@pamd13trustee.com

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN      MARY STRAVINSKI  
RE:     AKA: MARY CRAWLEY

CHAPTER 13

Debtor(s)

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Movant

CASE NO: 5-22-01642-MJC

MARY  
STRAVINSKI  
AKA: MARY  
CRAWLEY

Respondent(s)

**NOTICE**

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file a confirmable Chapter 13 Plan.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

U.S. Bankruptcy Court  
Max Rosenn U.S. Courthouse  
Courtroom #2  
197 S. Main Street  
Wilkes Barre, PA

Date: February 2, 2023  
Time: 10:00 AM

Any objection or response filed must be filed with the Clerk, U.S. Bankruptcy Court and served on the Chapter 13 Trustee.

Date: December 22, 2022

/s/ Agatha R. McHale, Esquire  
Id: 47613  
Attorney for Trustee  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: [info@pamdl3trustee.com](mailto:info@pamdl3trustee.com)

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IN RE: MARY STRAVINSKI  
AKA: MARY CRAWLEY

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MARY STRAVINSKI  
AKA: MARY CRAWLEY

Respondent(s)

**CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on December 22, 2022, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1<sup>st</sup> Class mail from Hummelstown, PA, unless served electronically.

Served electronically

VINCENT RUBINO, ESQUIRE  
712 MONROE STREET  
P.O. BOX 511  
STROUDSBURGPA18360-0511

United States Trustee  
228 Walnut Street  
Suite 1190  
Harrisburg, PA 17101

Served by 1<sup>st</sup> Class Mail

MARY STRAVINSKI  
303 Lower Swiftwater Road  
Cresco, PA 18326

I certify under penalty of perjury that the foregoing is true and correct.

Date: December 22, 2022

/s/ Vickie Williams  
Office of Standing Chapter 13 Trustee  
Jack N. Zaharopoulos  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

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JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE

Movant

MARY STRAVINSKI et al  
Respondent(s)

**ORDER DISMISSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed. The Court retains jurisdiction to rule on any timely filed fee application.